

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

vs

TALYA A. LUBIT

)
)
)
)
)

Case No. 2:24 CR 257-2

MOTION FOR EXTENSION OF TIME TO FILE PRETRIAL MOTIONS

The defendant, through counsel, respectfully files this Motion for Extension of Time to File Pretrial Motions requesting an extension of 45 days. In support thereof, counsel states:

- 1) The defendant was arraigned today on an indictment in the above-captioned matter.
- 2) Pursuant to Local Rule 12, the Federal Rule of Criminal Procedure 45(a), certain pretrial motions are due in fourteen days.
- 3) Given the case against the defendant has only just commenced, that counsel has received today the Rule 16 discovery materials, and that additional time is needed to conduct and complete the investigation of the facts and law for client consultation before informed decisions can be made concerning the filing of pretrial motions, the defendant hereby moves this Court for an extension of time of 45 days within which to file pretrial motions. Such an extension of time for filing pretrial motions would result in a new date of Friday, January 10, 2025.
- 4) The United States, through Assistant United States Attorney *Carolyn Bloch* consents to the granting of this motion.

WHEREFORE, the defendant requests that the motion to extend time for filing pretrial motions be granted, and that the time for filing such motions be extended for 45 days to January 10, 2025.

Respectfully submitted,

Attorney for Defendant

Talya Lubit

Defendant